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December 20, 2024

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 21A
New York, New York 10007-1312

RE: Sabby Volatility Warrant Master Fund Ltd. v. Safety Shot, Inc.,
No. 1:24-cv-920-NRB

Dear Judge Buchwald:

This firm represents Defendant “**Safety Shot**,” Inc. in the above-captioned action and writes jointly with counsel for Plaintiff “**Sabby**” Volatility Warrant Master Fund Ltd (together with Safety Shot, the “**Parties**”) to respectfully request that the Court extend the fact discovery deadline six weeks from today to January 31, 2025.

The Parties seek this extension because they are still waiting for non-party “**Wedbush**” Securities to produce documents responsive to Safety Shot’s October 10, 2024 subpoena, *i.e.*, “trading records sufficient to show Sabby’s buys, sells, daily position balances, locates / pre-borrows, and delivery of shares for Jupiter / Safety Shot securities from January 1, 2023 through March 31, 2024.” This extension is for the limited purpose of allowing the parties to receive the production from Wedbush, which, in turn, should provide Safety Shot with the materials to depose Sabby’s principal, Hal Mintz, and is without prejudice to either party seeking additional discovery based solely on the Wedbush production or the Mintz deposition or as might become appropriate in light of Your Honor’s ruling on Sabby’s pending motion to strike two of Safety Shot’s affirmative defenses. Earlier this evening, Safety Shot filed a letter requesting a conference to discuss its proposed motion to compel Wedbush’s response to that subpoena.

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The parties also request that the Court extend the deadline to seek leave to file motions for summary judgment from January 13, 2025 to March 21, 2025.

This is the Parties' third request to extend the fact discovery deadline and second request to extend the deadline to seek leave to file motions for summary judgment. Your Honor has granted the previous three requests.

Thank you for considering the Parties' requests.

Respectfully submitted,

/s/ Kari Parks

Kari Parks

cc: All counsel of record (via ECF)

Application granted.

So ordered.

A handwritten signature in blue ink, appearing to read 'Naomi Reice Buchwald', is written over a horizontal line.

NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: December 31, 2024

New York, New York